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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

WARREN HAVENS, SKYBRIDGE  
SPECTRUM FOUNDATION, a Delaware  
nonprofit corporation; TELESARUS VPC,  
LLC, a Delaware limited liability company;  
AMTS CONSORTIUM, LLC, a Delaware  
Limited Liability Company; INTELLIGENT  
TRANSPORTATION & MONITORING, LLC,  
a Delaware Limited Liability Company; and  
TELESARUS GB, LLC, a Delaware Limited  
Liability Company,

Plaintiffs,

v.

MOBEX NETWORK SERVICES, LLC, a  
Delaware Limited Liability Company; MOBEX  
COMMUNICATIONS, INC., a Delaware  
corporation; MARITIME  
COMMUNICATIONS/LAND MOBILE, LLC,  
a Delaware Limited Liability Company;  
PAGING SYSTEMS, INC., a California  
Corporation; TOUCH TEL CORPORATION, a  
California corporation; and JOHN DOE Nos. 1-  
20,

Defendants.

Civil Action No. 2:11-CV-00993-KSH-CW

**[PROPOSED] ORDER GRANTING  
MOTION OF DEFENDANTS  
PAGING SYSTEMS, INC. AND  
TOUCH TEL CORPORATION  
TO ENFORCE SETTLEMENT  
AGREEMENT AND FOR  
DISMISSAL WITH PREJUDICE  
PURSUANT TO RULE 41(b)**

THIS MATTER having been opened to the Court upon the motion of defendants Paging Systems, Inc. and Touch Tel Corporation (collectively, the “Paging Systems Defendants”) for an order granting the Paging Systems Defendants’ Motion to Enforce Settlement Agreement and For Dismissal with Prejudice Pursuant to Rule 41(b), and proper notice having been given to

counsel for Plaintiffs, and the Court having considered the written submission of the parties, and any oral argument of counsel, and good cause having been shown;

IT IS, on this \_\_\_\_\_ day of \_\_\_\_\_, 2014,

**ORDERED** that the Paging Systems Defendants' Motion to Enforce Settlement Agreement and For Dismissal with Prejudice Pursuant to Rule 41(b) is hereby **GRANTED**;

**IT IS FURTHER ORDERED** that Plaintiffs shall promptly comply with all of their outstanding obligations under the settlement agreement made and entered into April 8, 2013 ("Settlement Agreement"), by and between Plaintiffs and the Paging Systems Defendants including, but not limited to, (i) executing and delivering, via email, the Officer's Certificates and Assignment and Assumptions Agreements memorializing the assignments of geographic AMTS license effected by numbered paragraphs 2 and 3 of the Settlement Agreement, (ii) filing all required notices of consummation of assignment with the FCC, and (iii) causing Plaintiffs' counsel of record to execute and deliver, via email, a stipulation, in the form agreed to by the parties, dismissing the Paging Systems Defendants from this action with prejudice.

**IT IS FURTHER ORDERED** that Plaintiffs failure to deliver the executed closing documents identified above, and the executed stipulation of dismissal, to counsel for the Paging Systems Defendants within seven (7) days of the date of this Order shall result in the dismissal of this action against the Paging Systems Defendants, with prejudice, pursuant to Rule 41(b) of the Federal Rules of Civil Procedure

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Honorable Katherine S. Hayden, U.S.D.J.